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December 3, 2024

Hon. J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Rafael Alvarez
24 Cr. 221 (JPO)**

Your Honor:

Along with Michael K. Bachrach, Esq. I represent Rafael Alvarez in the above-captioned matter and write today for a modification of the defendant's bond so as to allow travel to franchise events taking place in West Palm Beach, Florida on December 5, 2024 and in Los Angeles, California the following week as detailed below.

Defendant Alvarez' current bail conditions include a \$600,000.00 appearance bond co-signed by four financially responsible individuals and secured by real property located in Cortland Manor, New York. His travel is restricted to the Southern and Eastern Districts of New York. He is also required to seek and maintain employment. To that end, Mr. Alvarez wishes to attend the following franchise events.

1) Mr. Alvarez has been invited to be a featured speaker at a franchise seminar to be held at Space Connect Work Lounge in West Palm Beach, Florida on Thursday, December 5, 2024 returning the following day on December 6, 2024.

2) Mr. Alvarez has been invited by the CFO of Movita Juice Bar Franchise in Los Angeles to visit three franchise locations in Los Angeles with a view towards bringing the brand to New York City. He requests permission to leave on Friday, December 13, 2024 from JFK Airport and return on a flight to JFK on December 15, 2024.

Pretrial Officer Andrew Abbott consents to these travel plans provided that Mr. Alvarez provide Pretrial Services with his full travel itinerary documentation.

Please note that the United States Attorney's Office per A.U.S.A. David Felton deferred to Pretrial regarding these requests.

Thank you for your consideration and continued courtesies to counsel.

Granted.

So ordered.

12/3/2024

Respectfully submitted,



Richard H. Rosenberg

Michael K. Bachrach



J. PAUL OETKEN

United States District Judge